

MULWALA POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

Licence Number: 4848

Incident Notification to Relevant Authorities

In accordance with the site Emergency Management Plan and NSW regulatory requirements, Mulwala will notify the relevant authorities in the event of a pollution incident.

Definition of a Pollution Incident

- Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined as:

- (a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment that causes or threatens "material harm" to the environment is caused or threatened.

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs'.

Environment Protection Licence (EPL) 4848 Details:

Name of licensee: Thales Australia Limited (ABN: 66 008 642)

Premises name and address: Thales Australia, Bayly Street, Mulwala, NSW, 2647

Website address: <https://www.mulwalacommunitysafety.com.au/>

Scheduled activity/activities on EPL: Chemical production, chemical storage, waste disposal (thermal and non- thermal treatment).

Fee-based activity/activities on EPL: Dangerous goods production, explosive production, general chemical storage, non-thermal treatment of hazardous and other waste, thermal treatment of hazardous and other waste.

Pollution incident – Person/s responsible

General Manager: Glenn Schmidt
Address: Bayly Street, Mulwala, NSW, 2647
Postal Address: Private Bag No. 1 Mulwala, NSW 2647
Email: Mulwala.MHF@thalesgroup.com.au
Phone: +61 (0)3 5742 2200

Potential Pollutants on Site

The site maintains a Dangerous Goods Manifest, which is available for emergency services and the relevant authorities at the Guardhouse in the event of an incident, major release or spill.

The following classes of potential pollutants are stored and used on the premises.

Dangerous Goods Class	Description
DG Class 1	Explosives
DG Class 2.1	Flammable gas
DG Class 2.3	Toxic Gas
DG Class 3	Flammable liquids
DG Class 4.1	Flammable solids
DG Class 4.2	Dangerous when wet
DG Class 5.1	Oxidising agent
DG Class 6.1	Toxic
DG Class 8	Corrosive
DG Class 9	Miscellaneous including Marine Pollutants

Pollution Incident Causes and Effects

The management of pollution incidents is formally documented in the Site Emergency Management Plan and the Pollution Incident Response Management Plan (PIRMP) - additionally Environmental risks are detailed in the Safety case as part of the sites Major Hazard Facility Licence (Licence No. 2010-001). These documents include site and safeguard mapping along with the identification of the types of incidents that may occur at the facility, the likelihood of an incident occurring and the potential effects and causes to both people on and off site, property and the environment.

Potential effects	Potential cause			
	Fire	Explosion	Vapour Release	Chemical spill
On people on site	Effects of incidents, releases and spills on people on-site are outlined in the MHF Safety Case, including risk assessment and controls.			
On people off site	A fire originating from the site would only threaten off-site receptors if uncontrolled on site. Effects would be consistent with bushfire	Minor to moderate injuries caused by dislodged fittings and fixtures and cracked or broken windows. There is an extremely remote chance of injury due to direct effects of the explosion.	<p>Ammonia – Ammonia vapours can be toxic if adequate precautions are not taken. Likely initial effects include nausea and headaches. Note: a nuisance odour spreads far beyond any hazardous event.</p> <p>Ether/Ethanol/Acid – While there may be a nuisance odour and some minor irritation, no serious effects are expected.</p>	Any adverse effects would be caused by a subsequent vapour release – please refer to vapour release.
On property	See effects on people	See effects on people	Vapour releases are not expected to adversely affect property off-site	Chemical spills are not expected to adversely affect property off-site
On the Environment	Consistent with conventional fire effects and firefighting methods.	Potential impacts would be limited to damage to vegetation (ie: trees) in the immediate vicinity	<p>Large releases of ammonia may have an adverse effect on aquatic life if not controlled adequately.</p> <p>Large releases of ether or ethanol are not expected to have a significant impact.</p> <p>A release of nitric acid may result in a release of nitric oxide fumes. These fumes may be washed out of the atmosphere by rain.</p>	While a spill may initially reach the ground, every effort would be taken to prevent long-term contamination.

What to do in the event of an emergency				
On site	<p>For minor incidents, spills or releases– follow procedures outlined in operating instructions, including use of spill kits and immediate remediation where appropriate.</p> <p>For major incidents – activate the site emergency response plan including but not limited to external services, use of site spill trailer, activation of the gross pollutant trap (GPT) as required.</p>			
Off-site	Activate fire plans as per civil fire service guidance	Residents should remain in their homes with all windows closed unless instructed to evacuate or an all clear is sounded by the relevant authorities	Residents should remain in their homes with all windows closed unless instructed to evacuate or an all clear is sounded by the relevant authorities	Residents should remain in their homes with all windows closed unless instructed to evacuate or an all clear is sounded by the relevant authorities

Testing of the PIRMP

The PIRMP is tested annually in conjunction with the annual site emergency exercise, which includes attendance by external emergency services, as required by legislation.

Emergency guidelines

1. Alarms – The facility siren does not necessarily indicate an emergency. Activation of the siren does not require a response from off-site emergency services or the local community
2. Site Emergency Procedure – All personnel on site are trained in what to do in the event of an emergency, accidental release or spill. The facility is well placed to deal with any situation through procedures and an equipped and trained emergency response team that works closely with state emergency services to ensure the best possible response in any emergency.

Mechanisms for providing early warnings and regular updates to local community residents

Thales Australia will update the Mulwala Community website as appropriate with respect to changes in to potential pollution incident causes and effects and any changes to emergency response actions. In the event of an incident, emergency services will undertake all communications with the local community residents where necessary.

Pollution Incident Notification Process

Action	Authority	Contact	Responsibility
If the incident presents an immediate threat to human health or property	Fire and Rescue NSW	000 emergency services (1300 729 579 if notification only)	Emergency controller or ERT captain.
If the incident does not require an initial combat agency, or Following the call to 000	As outlined below:		
Immediate notification of incident to applicable regulatory authority (ARA)	VP Health Safety and Environment	0481 337 777	Mulwala HSE Manager, Munitions HSE Manager or General Manager.
	NSW EPA Environment Line	131 555	Mulwala HSE Manager, Munitions HSE Manager or General Manager.
Immediate notification of incident to 24-hr contact for relevant authorities in the order given	NSW Health	(02) 6053 4800 1300 066 055 (ask for local Public Health Officer)	Mulwala HSE Manager, Munitions HSE Manager or General Manager.
	SafeWork NSW	13 10 50	Mulwala HSE Manager, Munitions HSE Manager or General Manager.
	Federation Shire (local government authority)	02 6033 8999 (BA) 1800 110 088 (AH)	Mulwala HSE Manager, Munitions HSE Manager or General Manager.
	Fire and Rescue NSW (if not called initially)	000 for emergency services (1300 729 579 if notification only)	Mulwala HSE Manager, Munitions HSE Manager or General Manager.

